UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

MARIANE PEARL, in her own right and as Representative of the ESTATE OF DANIEL PEARL, Deceased and as GUARDIAN FOR their MINOR SON,

Plaintiffs,

v.

AHMED OMAR SAEED SHEIKH a/k/a "CHAUDREY BASHIR" a/k/a "BASHIR", SHEIKH MOHAMMED ADEEL, AFTAB ANSARI, FAISAL BHATTI a/k/a ZUBAIR CHISHTI, NAEEM BUKHARI a/k/a QARI ATAUR RAHMAN, AMJAD FAROOQI (Deceased) a/k/a MANSUR HASNAIN a/k/a IMTIAZ SIDDIQUI a/k/a HAYDER OR HAIDER, FAZEL KARIM, ALI KHAN, SAUD MEMOM, The ESTATE OF SAUD MEMON And HEIRS OF SAUD MEMON, KHALED SHEIKH MOHAMMED, FAHAD NASEEM, MOHAMMED HASHIM QADEER a/k/a "ARIF" a/k/a HASHIM KADIR, ABDUL RAHMAN, ASIF RAMZI (Deceased), SALMAN SAQIB a/k/a SYED SULEIMAN SAQUIB, AL RASHID TRUST, AL AKHTAR TRUST INTERNATIONAL a/k/a AL AKHTAR TRUST, AL QAEDA, HABIB BANK LIMITED, HARAKAT UL-MUJAHEDEEN, HARAKAT UL-MUJAHEDEEN AL-ALMI, JAISH-E-MOHAMMED, LASHKAR-E-JHANGVI,

Defendants.

07 Civ. 6639

MOTION TO ADMIT COUNSEL PRO HAC VICE

7007 SEP 25 P.1 2: 2

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Joseph S. Hall, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of Applicant's Name: Kelly P. Dunbar

Firm Name: Kellogg, Huber, Hansen, Todd, Evans & Figel, P.L.L.C.

Address: 1615 M Street, N.W., Suite 400

Washington, D.C., 20036

Phone Number: 202-326-7944 Fax Number: 202-326-7999

Kelly P. Dunbar is a member in good standing of the Bar of the State of New York and the District of Columbia. There are no pending disciplinary proceedings against Kelly P. Dunbar in any State or Federal Court.

Dated: September 25, 2007

Respectfully submitted,

Joseph S. Hall

SDNY Bar Code: JH-2612

ruph D. Hall

KELLOGG, HUBER, HANSEN, TODD,

EVANS & FIGEL, P.L.L.C. 1615 M Street, N.W., Suite 400

Washington, D.C. 20036

202-326-7900 202-326-7999

Counsel for Defendant Habib Bank Limited



State of New York Supreme Gourt, Appellate Division Third Judicial Department

I, Michael J. Novack, Clerk of the Appellate Division of the Supreme Court of the State of New York, Third Judicial Department, do hereby certify that

Kelly P. Dunbar

having taken and subscribed the Constitutional Oath of Office as prescribed by law, was duly licensed and admitted to practice by this Court as an Attorney and Counselor at Baw in all courts of the State of New York on the 25th day of October, 2005, is currently in good standing and is registered with the Administrative Office of the Courts as required by section four hundred sixty-eight-a of the Judiciary Baw.

In Witness Whereof, I have hereunto set my hand and affixed the Seal of said Court, at the City of Albany, this 24th day of September, 2007.



Michael Moul



District of Columbia Court of Appeals Committee on Admissions 500 Indiana Avenue, N.M. — Room 4200 Washington, D. C. 20001 202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

KELLY P. DUNBAR

was on the	15 TH	day of	SEPTE	MBER,	2006	_			
duly qualif	ied and	admitted	as an	atto	rney	and	couns	selor	and
entitled to	practi	ce before	this	Court	and	is,	on	the	date
indicated be	elow, an	active mer	mber in	good	stand	ding	of th	is Ba	ır.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on September 20, 2007.

GARLAND PINKSTON, JR., CLERK

Ву:

eputyj Clerk

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

MARIANE PEARL, in her own right and as Representative of the ESTATE OF DANIEL PEARL, Deceased and as GUARDIAN FOR their MINOR SON,

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Defendants.

07 Civ. 6639

AFFIDAVIT OF JOSEPH S. HALL IN SUPPORT OF MOTION TO ADMIT COUNSEL <u>PRO HAC VICE</u>

District of Columbia) ss:

Joseph S. Hall, being duly sworn, hereby deposes and says as follows:

1. I am a partner at Kellogg, Huber, Hansen, Todd, Evans & Figel, P.L.L.C., counsel for Defendant Habib Bank Limited in the above-captioned action. I am familiar with the

proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of defendant's motion to admit Kelly P. Dunbar as counsel *pro hac vice* to represent defendant Habib Bank Limited in this matter.

- 2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law on October 24, 2000. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
 - 3. I have known Mr. Dunbar since September 2005.
- 4. Mr. Dunbar is an associate at Kellogg, Huber, Hansen, Todd, Evans & Figel, P.L.L.C., in Washington, D.C.
- 5. I have found Mr. Dunbar to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
- 6. Accordingly, I am pleased to move the admission of Kelly P. Dunbar, *pro hac vice*.
- 7. I respectfully submit a proposed order granting the motion to admit Kelly P. Dunbar, *pro hac vice*, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Kelly P. Dunbar, *pro hac vice*, to represent defendant Habib Bank Limited in the above captioned matter, be granted.

Dated: September 25, 2007

District of Columbia

Respectfully submitted,

loseph S. Hall

SDNY Bar Code: JH-2612

District of Columbia: SS

Subscribed and Sworn to before me

this <u>25th</u> day of <u>September</u>, 2007.

Biane m Cooke Notary Public, D.C.

My commission expires /0/31/2011

Diane M. Cooke Notary Public, District of Columbia My Commission Expires 10/31/2011

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing MOTION TO ADMIT COUNSEL PRO HAC VICE and AFFIDAVIT OF JOSEPH S. HALL IN SUPPORT OF MOTION TO ADMIT COUNSEL PRO HAC VICE was served via overnight mail, this 25th day of September, 2007.

Michael E. Elsner Ronald L. Motley Jodi Westbrook Flowers MOTLEY RICE LLC 28 Bridgeside Boulevard P.O. Box 1792 Mount Pleasant, SC 29465

Tel.: 843-216-9000

Counsel for Plaintiffs Mariane Pearl, in her own right and as Representative of the Estate of Daniel Pearl, Deceased and as Guardian for their Minor Son

Respectfully submitted,

SDNY Bar Code: JH-2612